



Air Quality Permitting Statement of Basis

April 7, 2005

Tier I Operating Permit No. T1-050100

**Kootenai River Lumber Co., LLC,
dba Riley Creek – Bonners Ferry
Bonners Ferry, Idaho**

Facility ID No. 021-00002

Prepared by:

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AIR QUALITY DIVISION**

Final

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Acronyms, Units, and Chemical Nomenclatures

AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
CAA	Clean Air Act
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
HAPs	Hazardous Air Pollutants
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
Rules	Rules for the Control of Air Pollution in Idaho
scf	standard cubic feet
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SO ₂	sulfur dioxide
T/yr	tons per year
µg/m ³	micrograms per cubic meter
UTM	Universal Transverse Mercator
VOC	volatile organic compound

1. PURPOSE

The purpose for this memorandum is to satisfy the requirements of IDAPA 58.01.01.381, *Rules for the Control of Air Pollution in Idaho – Administrative Permit Amendments* for Tier I Operating Permits. This memorandum is meant only to clarify the change of ownership of the facility, and not to provide an in depth description of the facility.

2. FACILITY DESCRIPTION

The Kootenai River Lumber Co. Bonners Ferry facility produces dimensional lumber.

3. FACILITY / AREA CLASSIFICATION

The Kootenai River Lumber facility is defined as a major facility because the VOC emissions exceed 100 tons per year. The AIRS classification is "A" because the potential to emit of VOC is above major source levels.

The facility is located within AQCR 63 and UTM zone 11. The facility is located in Boundary County which is designated as unclassifiable for all criteria pollutants (PM₁₀, CO, NO_x, SO₂, lead, and ozone).

The AIRS information provided in Appendix A defines the classification for each regulated air pollutant emitted. This required information is entered into the EPA AIRs database.

4. APPLICATION SCOPE

The Kootenai River Lumber Co., LLC, dba Riley Creek Lumber Co., purchased the facility from Louisiana Pacific and has requested a change in the facility name and ownership. This administrative amendment does not result in an increase in emissions.

4.1 Application Chronology

January 20, 2005	Change of ownership notification is received
March 21, 2005	The application was determined complete by default

5. PERMIT ANALYSIS

This section of the Statement of Basis describes the regulatory requirements for this Tier I permitting action.

5.1 Emissions Inventory

No emission inventory data is included in this administrative amendment.

5.2 Modeling

Modeling is not required.

5.3 Regulatory Review

This section describes the regulatory analysis of the applicable air quality rules with respect to this permit action.

IDAPA 58.01.01.300..... Procedures and Requirement for Tier I Operating Permits
Sections 58.01.01.300 thru 399 establish procedures and requirements for Tier I operating permits.

IDAPA 58.01.01.381..... Administrative Permit Amendments
Section 381 defines administrative amendments and establishes applicant and implementation procedures for administrative amendments.

5.4 Fee Review

The facility is a major facility as defined in IDAPA 58.01.01.008.10 and is therefore subject to registration and registration fees in accordance with IDAPA 58.01.01.387. This facility is current with its Tier I registration fees.

6. PUBLIC COMMENT

No public comment is required by this permitting action in accordance with IDAPA 58.01.01.381.02.c because there is not an increase in emissions.

7. RECOMMENDATION

Based on review of all applicable state and federal rules and regulations, staff recommends that the Kootenai River Lumber Co., LLC be issued amended Tier I Operating Permit No. T1-050100. No public comment period is recommended, and the project does not involve PSD requirements.

CM/sd Permit No. P-050100

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APPENDIX A

AIRS Information

TI-050100

AIRS/AFS^a FACILITY-WIDE CLASSIFICATION^b DATA ENTRY FORM

Facility Name: Kootenai River Lumber Co., LLC, dba Riley Creek Lumber Co.
Facility Location: Bonnerr's Ferry
AIRS Number: 021-00002

AIR PROGRAM POLLUTANT	SIP	PSD	NSPS (Part 60)	NESHAP (Part 61)	MACT (Part 63)	SM80	TITLE V	AREA CLASSIFICATION A-Attainment U-Unclassified N- Nonattainment
SO ₂	B						B	U
NO _x	B						B	U
CO	B						B	U
PM ₁₀	B						B	U
PT (Particulate)	B						B	U
VOC	A						A	U
THAP (Total HAPs)	B						B	U
			APPLICABLE SUBPART					

^a Aerometric Information Retrieval System (AIRS) Facility Subsystem (AFS)

^b AIRS/AFS Classification Codes:

- A = Actual or potential emissions of a pollutant are above the applicable major source threshold. For HAPs only, class "A" is applied to each pollutant which is at or above the 10 T/yr threshold, or each pollutant that is below the 10 T/yr threshold, but contributes to a plant total in excess of 25 T/yr of all HAPs.
- SM = Potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable regulations or limitations.
- B = Actual and potential emissions below all applicable major source thresholds.
- C = Class is unknown.
- ND = Major source thresholds are not defined (e.g., radionuclides).